

ORIGINAL

BEFORE THE

Federal Communications Commission RECEIVED

WASHINGTON, D.C. 20554

JUL 8 1996

In the Matter of)
Amendment of Section 73.202(b))
Table of Allotments,) MM Docket No. 93-314
FM Broadcast Stations,) RM-8396
(Cadiz and Oak Grove, Kentucky))

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Directed to: The Commission

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APPLICATION FOR REVIEW

Southern Broadcasting Corporation ("Southern"), licensee of Stations WDXN(AM), Clarksville, Tennessee, and WABD(AM) and WCVQ(FM), Fort Campbell, Kentucky, hereby files this application for review of the Memorandum Opinion and Order, DA 96-878 (Policy and Rules Division, released June 7, 1996) ("MO&O"). In the MO&O, the Policy and Rules Division denied Southern's petition for reconsideration of the Report and Order, 10 FCC Rcd 10785 (Policy and Rules Division, 1995) which granted a request by Ham Broadcasting, Inc. ("Ham"), licensee of Station WKDZ-FM, Cadiz, Kentucky, to change its community of license from Cadiz to Oak Grove, Kentucky and to authorize operation by WKDZ-FM on Channel 293C3 in lieu of its current Cadiz channel, 292A. In support of this application for review, the following is stated:

Section 1.115 Considerations

Southern has standing to file an application for review of the MO&O under Section 1.115(a) of the rules because it is the "person aggrieved" by the action taken by the Policy and Rules Division in the MO&O. Southern's opposition to Ham's Clarksville move-in began with initial comments filed February 18, 1994.

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Section 1.115(b)(1) of the rules requires that an application for review concisely and plainly state the questions presented for review with reference to specific findings of fact or conclusions of law. The question presented for review is as follows:

For purposes of considering a suburban community's eligibility for a first-service preference in an FM allocation proceeding, should the Commission base its determination on the community's relationship with one city within an urbanized area or upon the community's ties to the metropolitan area as a whole?

In paragraph 2 of the MO&Q, the Commission's staff holds that Oak Grove's lack of dependence on Clarksville, Tennessee, the "central city" of the Clarksville, Tennessee-Kentucky urbanized area, is the key factor in determining that Oak Grove is eligible for a first-service preference. Such a first-service preference is needed to justify removal of Cadiz and Trigg County, Kentucky's only FM service, their only nighttime transmission and their only "competitive service." See Van Wert, Ohio and Monroeville, Indiana, 7 FCC Rcd 6519 (M. Med. Bur., 1992); Fredericksburg and Helotes, Texas, 10 FCC Rcd 6580 (M. Med. Bur. 1995) (reallocation of FM channels denied where the changes would deprive communities of their only full-time services and only competitive services).¹

Section 1.115(b)(2) of the rules requires that an application for review specify the factors which warrant Commission consideration of the question set forth above. In this instance, as shown below, the action taken pursuant to delegated authority is in conflict with established Commission allocation policy.

Based on the showings made below, Southern hereby requests that the Commission reverse the MO&Q, grant Southern's October 26, 1995 petition for reconsideration, and rescind the

¹The mayor of Cadiz, the Cadiz, Trigg County Chamber of Commerce and the County Judge-Executive and Magistrates of Trigg County all opposed the removal of WKDZ-FM to Oak Grove in separate comments filed in February 1994. All said Cadiz needs an FM nighttime service.

allocation of Channel 293C3 to Oak Grove, Kentucky and the accompanying modification of Station WKDZ-FM's license.

Factual Background

Oak Grove, Kentucky is located in the Clarksville, Tennessee-Kentucky urbanized area.² The urbanized area consists of Clarksville, Oak Grove and Fort Campbell North, a census-designated place.³ According to the 1990 census, Oak Grove had a population of 2,863; Fort Campbell North, 18,861; and Clarksville, 75,494.⁴ Oak Grove's entire southern boundary is contiguous with Clarksville, and all of Fort Campbell North's eastern boundary is contiguous with Oak Grove.

Operating as a Class C-3 facility from Oak Grove, WKDZ-FM would provide city-grade service to 58% of the Clarksville urbanized area, including 50% of Clarksville itself. The city of Clarksville would be entirely within the 1 mV/m (primary) service area of the C-3 facility. Over 55% of the population within Ham's proposed gain area represents the population of the Clarksville urbanized area.⁵

With respect to the relationship between Oak Grove and the Clarksville urbanized area, in its March 4, 1994 reply comments (at pages 3-10) Southern presented the following evidence of interdependence based upon the eight factors for making such an assessment as set forth in Faye and Richard Tuck, Inc., 3 FCC Rcd 5374 (1988):

²Comments of Southern Broadcasting Corporation, February 18, 1994, Exhibit A. See also Attachment 1 hereto, page 3 (official notice requested).

³Id.

⁴Attachment 1, pages 2 & 5.

⁵Reply Comments of Southern Broadcasting Corporation, March 4, 1994, Attachment 1.

- Ninety percent of Oak Grove's residents work at Fort Campbell, the second largest community within the urbanized area and the largest industry in the metropolitan area.
- Oak Grove does not have its own local newspaper.
- Oak Grove's business community is directly tied to Fort Campbell.
- Oak Grove, a bedroom community for Fort Campbell military personnel, does not have its own telephone directory, its own hospital or public transportation system.
- Over 50 Oak Grove businesses had advertised on WABD/WCVQ, which serve the metro area, demonstrating that Oak Grove, Clarksville and Fort Campbell are in the same advertising market.
- Oak Grove does not have a public school or a public library, and its police and fire departments work closely with those in other communities in the Clarksville area.

Argument

The Commission's staff is incorrect in holding that a demonstration of independence from a "central city" within an urbanized area is sufficient to establish a community's independence from the metropolitan area as a whole. To support its position that the central city is the key, the MO&O cites RKO General (KFRC), 5 FCC Rcd 3222 (1990), and Tuck, supra. While it is true that the term "central city" appears in both cases, the references are generic. In both cases, the focus was the relationship of the "specified community" with "the larger metropolitan area." Indeed, in enumerating the eight interdependence factors in Tuck, the Commission used the term "larger metropolitan area" in describing factors (1), (3), and (8). The item "central city" appears only once, in the description of factor (8). Tuck, supra, 3 FCC Rcd at 5378. Similarly, in RKO General (KFRC), supra, the Commission was concerned with the relationship of Richmond, California to the "San Francisco-Oakland metropolitan area," the "metropolitan area," or the "Bay Area," not just San Francisco (the central city). RKO, supra at 3223-24 (¶¶ 9, 11, 15-19). Clearly, interdependence of

the Texas communities in Tuck with Fort Worth, or of Richmond, California with Oakland, would have been just as fatal from a Section 307(b) standpoint as interdependence with Dallas or San Francisco, respectively. By saying a first-service preference is available where a degree of independence can be shown vis-a-vis one community within an urbanized area but not from the others is too narrow a reading of Tuck and RKO.

By definition, Fort Campbell, Oak Grove and Clarksville are related by virtue of the continuity of their urban setting. According to the Census Bureau, “A UA [urbanized area] comprises one or more places (“central place”) and the adjacent densely settled surrounding territory (“urban fringe”) that together have a minimum of 50,000 persons.”⁶ Clarksville, Oak Grove and Fort Campbell are a single “central place” under this definition. The fact Oak Grove may be more dependent on Fort Campbell than Clarksville is irrelevant. The important issue in Tuck and RKO is whether the specified community is or is not dependent on the metropolitan area of which it is, by definition, an integral part. Oak Grove is interdependent with Fort Campbell, which is just as much a part of the whole as Clarksville. For this reason, distinguishing between the “central city” and the other constituent parts of the Bureau of the Census’ designated urbanized area cannot be sustained unless there is evidence that Fort Campbell is apart from Clarksville, too. In sticking to its narrow “central city” premise, the staff below has created a legal anomaly that is inconsistent with the realities of urban interdependence. The fact remains that Ham is proposing to abandon Cadiz, an underserved rural community, and “move-in” to the Clarksville metro area, contrary to the Commission’s policies against such move-ins. See Modification of FM and TV Authorizations to

⁶See Ham’s February 18, 1994 comments, Exhibit 2, page A-12 (1990 Census of Population and Housing - Tennessee).

Specify a New Community of License, 5 FCC Rcd 7094, 7096-97 (1990). The MO&O's manipulation of the urbanized area concept to accomplish this otherwise unacceptable reallocation is a reversible error.

Conclusion

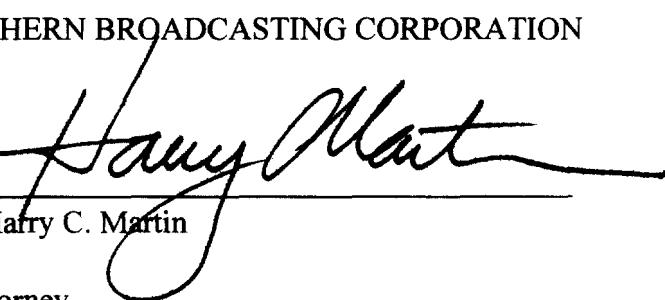
By narrowing its focus to the "central city" in its analysis of Southern's showings with respect to the interdependence of Oak Grove, Kentucky to the Clarksville, Tennessee-Kentucky urbanized area, the staff below failed to take into account the Commission's focus, in prior decisions, on the interrelationship between a "specified community" to the larger metropolitan area as a whole. Where an urbanized area has several constituent communities, interdependence with any one of them is sufficient to negate the first-service preference sought for another community within the urbanized area.

WHEREFORE, These matters considered, it is respectfully requested that the Commission review and reverse the assignment of Channel 293C3 to Oak Grove, Kentucky and the modification of the license for Station WKDZ-FM accordingly.

Respectfully submitted,

SOUTHERN BROADCASTING CORPORATION

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July 8, 1996

CERTIFICATE OF SERVICE

I, Mary A. Haller, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that a true copy of the foregoing "Application for Review" was sent this 8th day of July, 1996, by first-class United States mail, postage-prepaid, to the following:

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Mary A. Haller
Mary A. Haller

U.S. Department of Commerce
Economics and Statistics Administration
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CENSUS '90



1990 CPH-2-19

1990 Census of
Population and Housing
Population and Housing
Unit Counts
Kentucky

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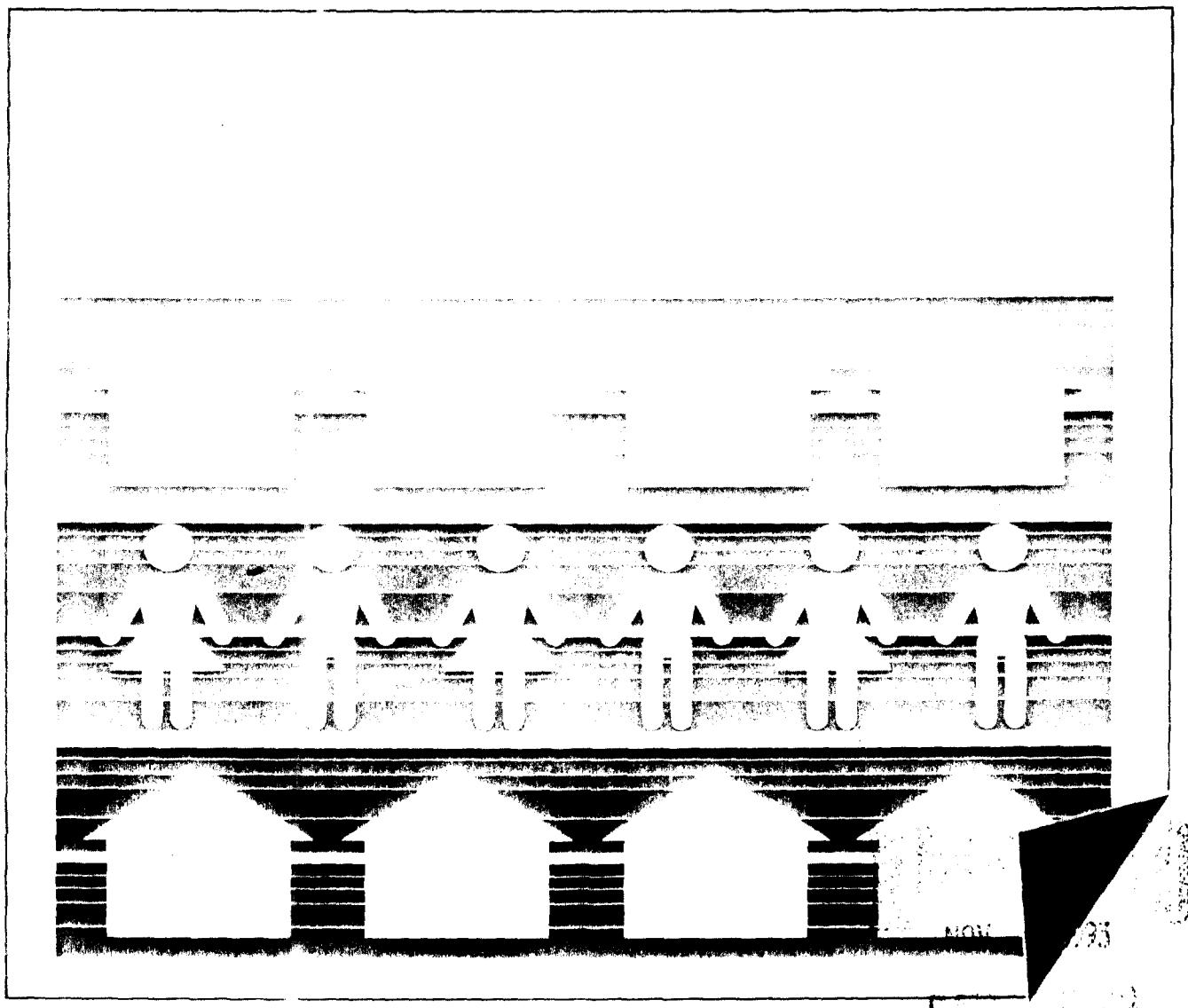


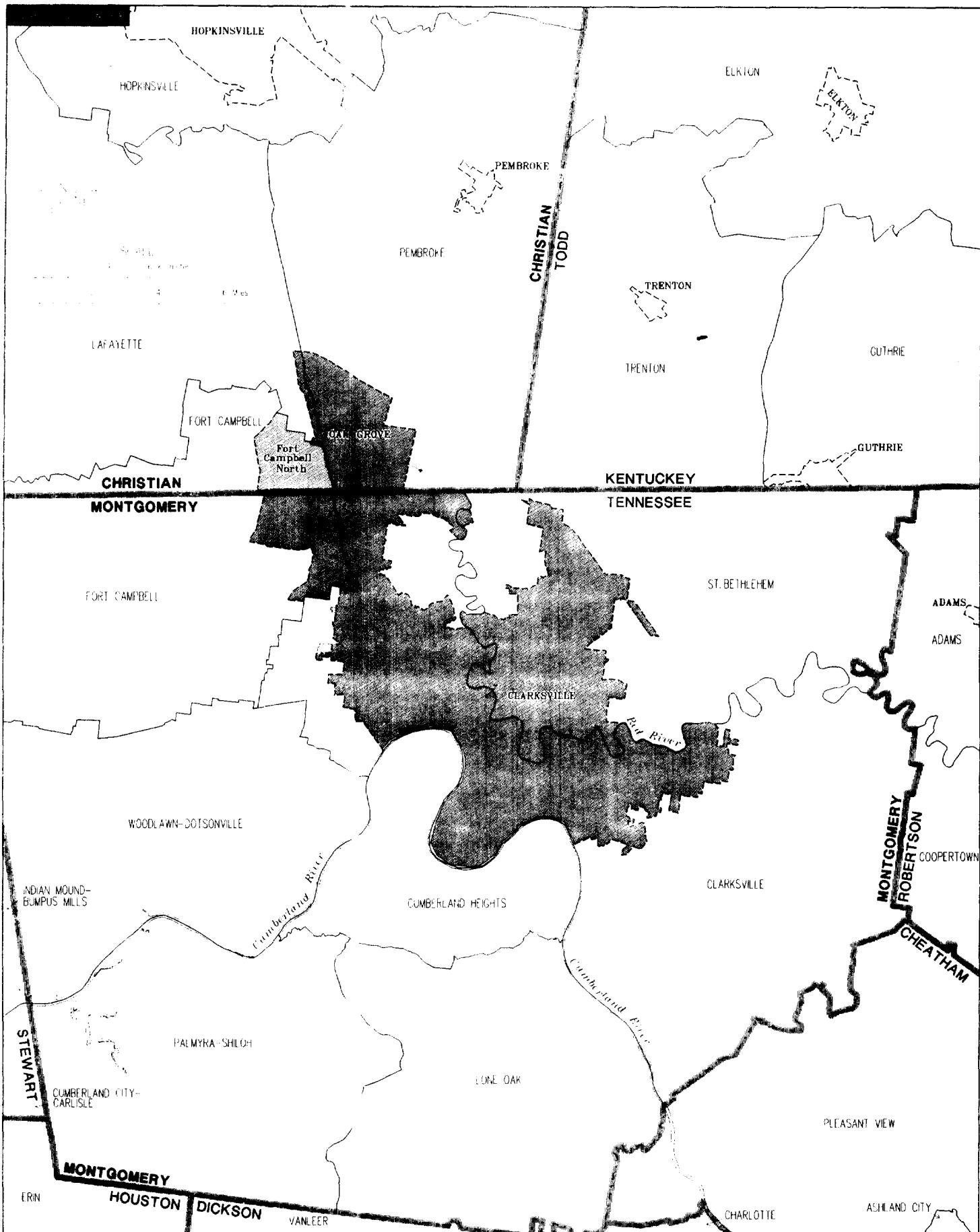
Table 8. Population and Housing Units, 1970 to 1990; Area Measurements and Density: 1990—Con.

[For information concerning historical counts, see "User Notes." Density is computed using land area. For definitions of terms and meanings of symbols, see text.]

State County County Subdivision Place	Population			Housing units			1990 area measurements				1990 density			
							Total area		Land area		Population per—		Housing units per—	
	1990	1980	1970	1990	1980	1970	Square kilometers	Square miles	Square kilometers	Square miles	Square kilometer	Square mile	Square kilometer	Square mile
Casey County—Con. South Fork division	1 099	1 306	1 274	479	542	468	237.5	91.7	237.5	91.7	4.6	12.0	2.0	5.2
Christian County	68 941	66 878	56 224	23 429	21 195	16 227	1 875.3	724.1	1 868.3	721.4	36.9	95.6	12.5	32.5
Crofton division	4 947	5 105	1 949	1 773	1 661	1 267	697.7	269.4	694.3	268.1	7.1	18.5	2.8	7.3
Crofton city	699	823	314	359	267	17	6	6	6	6	411.2	1 165.0	184.7	523.3
Fort Campbell division	18 861	17 800	13 619	2 957	2 966	1 787	54.4	21.0	54.3	21.0	347.3	898.1	54.5	140.8
Fort Campbell North CDP	18 861	17 211	13 616	2 957	2 960	1 786	10.2	3.9	10.2	3.9	1 849.1	4 836.2	289.9	758.2
Oak Grove city (pt.)	—	—	—	—	—	—	.2	.1	.2	.1	—	—	—	—
Hopkinsville division	37 559	36 858	15 219	13 712	—	—	524.6	202.5	522.3	201.7	71.9	186.2	29.1	75.5
Hopkinsville city	29 809	27 318	21 395	12 236	10 528	7 643	52.7	20.3	52.7	20.3	565.6	1 468.4	232.2	602.8
Lafayette division	1 979	2 285	2 362	887	865	868	331.7	128.1	331.0	127.8	6.0	15.5	2.7	6.9
Lafayette city	106	160	158	55	71	67	6	2	6	2	176.7	530.0	91.7	275.0
Oak Grove city (pt.)	21	25	14	19	—	—	1.7	.6	1.7	.6	12.4	35.0	8.2	23.3
Pembroke division	5 595	4 830	3 376	2 417	1 879	1 117	266.9	103.0	266.5	102.9	21.0	54.4	9.1	23.5
Oak Grove city (pt.)	842	563	1 357	888	—	—	22.8	8.8	22.8	8.8	124.6	323.0	59.5	154.2
Pembroke city	640	636	634	209	211	201	2.4	.9	2.4	.9	224.7	711.1	87.1	232.2
Clark County	29 496	28 322	24 090	11 635	10 414	8 193	660.9	255.2	658.7	254.3	44.8	116.0	17.7	45.8
Boonesboro division	1 885	1 935	—	746	718	—	122.6	47.3	121.8	47.0	15.5	40.1	6.1	15.9
Clark Southeast division	2 770	2 988	—	1 014	1 002	—	219.3	84.7	218.4	84.3	12.7	32.9	4.6	12.0
Winchester division	24 841	23 399	—	9 875	8 694	—	319.1	123.2	318.6	123.0	78.0	202.0	31.0	80.3
Winchester city	15 799	15 216	13 402	6 592	6 014	4 851	14.7	5.7	14.6	5.7	1 082.1	2 771.8	451.5	1 156.5
Clay County	21 746	22 752	18 481	7 930	7 403	5 464	1 220.1	471.1	1 219.9	471.0	17.8	46.2	6.5	16.8
Ashers Fork division	1 778	1 948	—	575	582	—	218.1	84.2	218.1	84.2	8.2	21.1	2.6	6.8
Big Creek division	3 877	4 763	—	1 341	1 477	—	247.4	95.5	247.4	95.5	15.7	40.6	5.4	14.0
Burning Springs division	5 601	5 140	—	2 005	1 710	—	313.0	120.9	313.0	120.9	17.9	46.3	6.4	16.6
Manchester division	5 176	5 366	—	2 083	1 894	—	78.9	30.5	78.7	30.4	65.8	170.3	26.5	68.5
Manchester city	1 634	1 838	1 664	752	697	566	3.9	1.5	3.9	1.5	419.0	1 089.3	192.8	501.3
Oneida division	2 374	2 397	—	906	809	—	201.0	77.6	201.0	77.6	11.8	30.6	4.5	11.7
Sherman-Toms division	2 940	3 138	—	1 020	931	—	161.7	62.4	161.7	62.4	18.2	47.1	6.3	16.3
Clinton County	9 135	9 321	8 174	4 189	4 031	2 854	532.4	205.5	511.4	197.5	17.9	46.3	8.2	21.2
Albany division	6 570	6 879	3 009	2 943	—	—	319.1	123.2	307.5	118.7	21.4	55.3	9.8	25.3
Albany city	2 062	2 083	1 891	997	951	720	5.9	2.3	5.9	2.3	349.5	896.5	169.0	433.5
Cumberland City division	2 565	2 442	2 332	1 180	1 088	802	213.2	82.3	203.9	78.7	12.6	32.6	5.8	15.0
Crittenden County	9 196	9 207	8 493	4 039	3 830	3 373	960.8	371.0	938.0	362.2	9.8	25.4	4.3	11.2
Crittenden East division	1 780	1 617	—	717	654	—	343.6	140.4	361.8	139.7	4.9	12.7	2.0	5.1
Crittenden South division	1 807	1 788	—	840	720	—	232.3	89.7	231.0	89.2	7.8	20.3	3.6	9.4
Duquesne city	47	64	89	28	32	(NA)	—	—	—	—	470.0	—	280.0	—
Crittenden West division	1 225	1 196	—	485	444	—	258.6	99.8	239.3	92.4	5.1	13.3	2.0	5.2
Marion division	4 384	4 606	—	1 997	2 012	—	106.3	41.0	105.9	40.9	41.4	107.2	18.9	48.8
Marion city	3 320	3 392	3 008	1 555	1 560	1 312	8.3	3.2	8.3	3.2	400.0	1 037.5	167.3	485.9
Cumberland County	6 784	7 289	6 850	3 051	3 147	2 604	805.1	310.9	792.1	305.8	8.6	22.2	3.9	10.0
Burkesville division	4 287	4 677	4 306	1 908	1 966	1 642	409.8	158.2	406.8	157.1	10.5	27.3	4.7	12.1
Burkesville city (pt.)	1 773	2 019	1 717	802	662	630	5.3	2.1	5.3	2.0	334.5	886.5	151.3	401.0
Cumberland South division	2 497	2 612	2 544	1 143	1 181	962	395.3	152.6	385.3	148.8	6.5	16.8	3.0	7.7
Burkesville city (pt.)	42	32	—	15	11	—	1.9	.7	1.9	.7	22.1	60.0	7.9	21.4
Daviess County	87 189	85 949	79 486	35 041	31 665	25 374	1 233.6	476.3	1 197.7	462.4	72.8	188.6	29.3	75.8
Daviess East division	20 362	17 562	—	7 148	862	—	525.5	202.9	510.5	197.1	39.9	103.3	14.0	36.3
Owensboro city (pt.)	109	2	—	32	2	—	2.0	8	1.0	4	109.0	272.5	32.0	80.0
Whitesville city	682	788	752	268	284	245	1.2	4	1.2	4	568.3	1 705.0	223.3	670.6
Daviess West division	21 474	18 697	—	7 890	6 212	—	668.0	257.9	649.6	250.8	33.1	85.6	12.1	31.5
Masonville CDP	1 119	—	—	393	—	—	23.2	8.9	23.2	8.9	48.2	125.7	16.9	44.2
Owensboro city (pt.)	8 870	5 719	(NA)	3 365	1 951	(NA)	10.2	3.9	10.2	3.9	86.6	2 274.4	329.9	662.6
Owensboro division	45 353	49 690	—	20 003	19 591	—	40.1	15.5	37.6	14.5	1 206.2	3 127.8	532.0	1 379.5
Owensboro city (pt.)	44 570	48 729	(NA)	19 677	19 204	(NA)	29.7	11.5	27.6	10.7	1 614.9	4 165.4	72.9	1 839.4
Edmonson County	10 357	9 962	8 751	5 009	4 221	3 105	797.8	308.0	783.8	302.6	13.2	34.2	6.4	16.6
Brownsville division	4 810	4 300	3 702	1 916	1 657	1 334	232.8	89.9	232.0	89.6	20.7	53.7	8.3	21.4
Brownsville city (pt.)	897	674	542	402	285	205	4.1	1.6	4.1	1.6	218.8	560.6	95.0	251.0
Brownsville North division	3 213	3 441	2 945	1 571	1 365	1 084	178.7	69.0	173.5	67.0	18.5	48.0	9.1	23.4
Lincoln division	1 354	1 185	1 120	1 123	806	379	281.1	108.5	273.7	105.7	4.9	12.8	4.1	10.5
Brownsville city (pt.)	980	1 036	984	399	393	308	105.2	40.6	104.6	40.4	9.4	24.3	3.8	9.4
Sunfish division	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elliott County	6 455	6 908	5 933	2 639	2 499	1 881	609.2	235.2	606.0	234.0	10.7	27.6	4.4	11.4
Unionville division	2 024	2 346	2 091	812	849	634	271.7	104.9	270.0	104.3	7.5	19.4	3.0	7.8
Sandy Hook division	4 431	4 562	3 842	1 827	1 650	1 247	337.6	130.3	336.0	129.7	13.2	34.2	5.4	14.1
Sandy Hook city	548	627	561	263	253	188	2.4	.9	2.4	.9	228.3	608.9	109.6	292.2

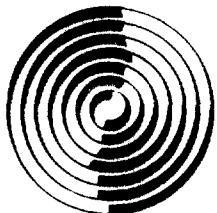
Urbanized Areas

ATTACHMENT 1, PAGE 3



U.S. Department of Commerce
Economics and Statistics Administration
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CENSUS '90



1990 CPH-2-44

1990 Census of
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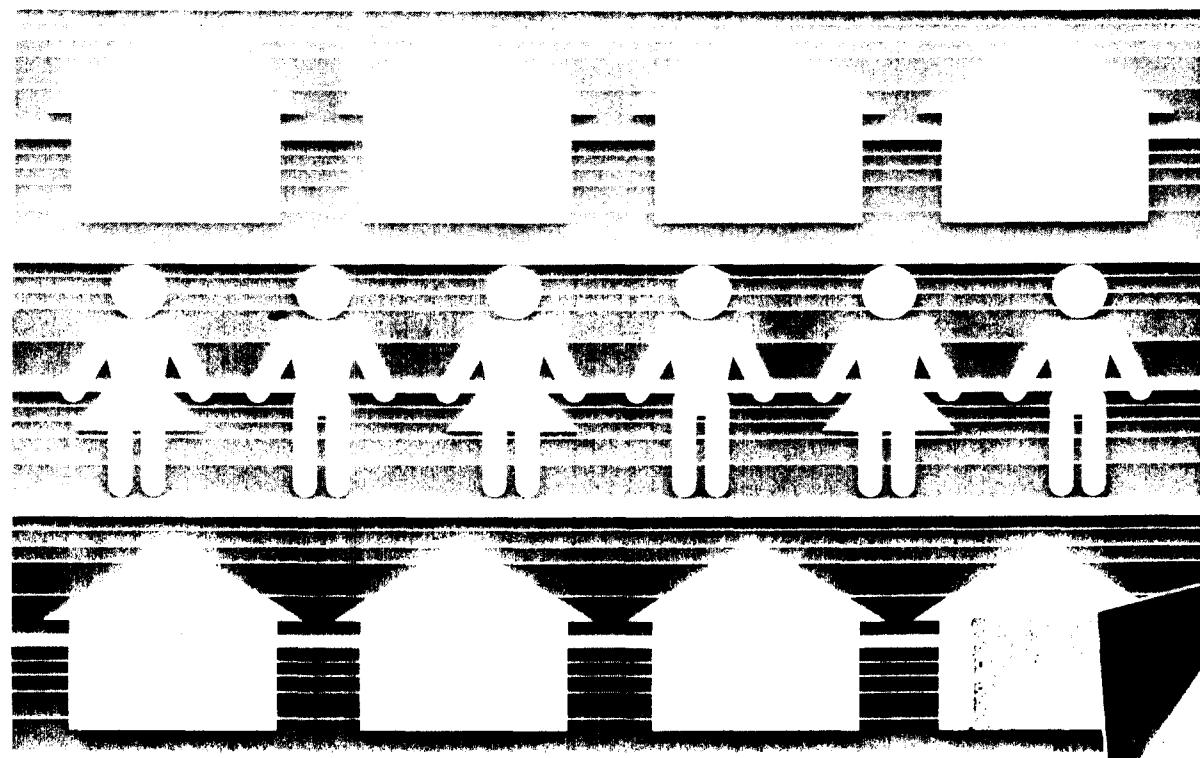


Table 8. Population and Housing Units, 1970 to 1990; Area Measurements and Density: 1990—Con.

[For information concerning historical counts, see "User Notes." Density is computed using land area. For definitions of terms and meanings of symbols, see text.]

State TENNESSEE	County	County Subdivision	Population			Housing units			1990 area measurements				1990 density							
			Place			1990	1980	1970					Total area		Land area		Population per—		Housing units per—	
				1990	1980	1970	1990	1980	1970	Square kilometers	Square miles	Square kilometers	Square miles	Square kilometer	Square mile	Square kilometer	Square mile			
Monroe County	Tellico Plains division	—Con.																		
	Tellico Plains town	†	6 434	6 228	5 112	2 908	2 613	1 701	780.8	301.5	779.8	301.1	8.3	21.4	3.7	9.7				
			657	698	773	328	295	286	4.2	1.6	4.2	1.6	156.4	410.6	78.1	205.0				
	Vonore division		3 857	3 407	2 891	1 673	1 304	1 069	447.6	172.8	403.6	155.8	9.6	24.8	4.1	10.7				
	Vonore town	†	605	528	524	272	216	192	18.0	6.9	11.5	4.4	52.6	137.5	23.7	61.8				
Montgomery County	Clarksville division	†	100 498	83 342	62 721	37 233	29 724	18 815	1 408.6	543.9	1 396.4	539.2	72.0	186.4	26.7	69.1				
	Clarksville city (pt.)	†	64 666	53 399	46 852	26 185	20 489	10 859	376.3	145.3	373.4	144.2	173.2	448.4	70.1	181.6				
	Cumberland Heights division		57 216	43 317	31 719	23 318	18 157	10 859	122.1	47.2	120.7	46.6	474.0	1 227.8	193.2	500.4				
	Fort Campbell division		4 632	4 317	—	1 833	1 612	—	84.8	32.8	82.2	31.7	56.4	146.1	22.3	57.8				
	Clarksville city (pt.)	†	9 714	8 340	10 069	1 185	1 280	1 111	174.4	67.4	174.2	67.3	55.8	144.3	6.8	17.6				
	Lone Oak division		8 986	7 925	—	955	1 255	—	15.0	5.8	15.0	5.8	599.1	1 549.3	63.7	164.7				
	Palmyra-Shiloh division		3 562	3 044	—	1 305	1 113	—	179.4	69.3	178.7	69.0	19.9	51.6	7.3	18.9				
	St. Bethlehem division		2 366	2 084	1 692	946	792	607	187.8	72.5	185.3	71.6	53.2	137.9	5.1	13.2				
	Clarksville city (pt.)	†	11 913	8 797	4 882	4 352	3 170	1 606	224.3	86.6	223.9	86.4	173.7	448.9	50.4	162.8				
	Woodlawn-Dotsonville division		9 292	—	—	3 369	—	—	53.6	20.7	53.5	20.7	178.7	69.0	20.4	52.8				
			3 645	3 361	—	1 427	1 268	—	181.6	70.1	181.6	70.1	8.0	20.7	—	—				
Moore County	Bakersstown division	†	4 721	4 510	3 568	1 912	1 669	1 242	337.7	130.4	334.6	129.2	14.1	36.5	5.7	14.8				
	Lynchburg, Moore County (pt.)	†	2 636	2 427	—	1 066	882	—	190.3	73.5	187.2	72.3	14.1	36.5	5.7	14.7				
	Lynchburg division		2 085	2 083	—	1 066	—	—	190.3	73.5	187.2	72.3	14.1	36.5	5.7	14.7				
	Lynchburg, Moore County (pt.)	†	2 085	668	538	846	787	213	147.4	56.9	147.4	56.9	14.1	36.6	5.7	14.9				
Morgan County	Coalfield division	†	17 300	16 604	13 619	6 378	5 924	4 168	1 353.0	522.4	1 352.2	522.1	12.8	33.1	4.7	12.2				
	Oliver Springs town (pt.)	†	4 330	4 343	4 114	1 512	1 373	1 076	151.8	58.6	151.8	58.6	28.5	73.9	10.0	25.8				
	Lancing division		51	59	34	21	21	12	4	2	4	2	127.5	255.0	52.5	105.0				
	Oakdale division		2 345	2 700	2 515	963	983	745	364.0	140.6	364.0	140.6	6.4	16.7	2.6	6.8				
	Hornman city (pt.)	†	3 901	3 945	2 731	1 487	1 370	877	308.4	119.1	307.6	118.8	12.7	32.8	4.8	12.5				
	Oakdale town		268	323	376	111	128	157	—	2.5	—	—	—	—	—	—				
	Sunbright division		2 748	2 904	2 462	1 149	1 159	876	376.0	145.2	375.9	145.2	7.3	18.9	3.1	7.9				
	Wartburg division		3 976	2 712	1 797	1 267	1 039	594	152.8	59.0	152.8	59.0	26.0	67.4	8.3	21.5				
	Wartburg city	†	932	761	541	375	313	197	2.2	.8	2.2	.8	423.6	1 165.0	170.5	468.8				
Obion County	Dixie division	†	3 717	32 781	30 247	13 359	13 059	11 173	1 438.4	555.4	1 411.4	544.9	22.5	58.2	9.5	24.5				
	Eldridge-Cloverdale division		2 144	2 257	1 643	803	834	571	205.8	79.4	189.6	73.2	11.3	29.3	4.2	11.0				
	Hornbeak-Samburg division		935	969	992	397	403	357	148.1	57.2	148.1	57.2	6.3	16.3	2.7	6.9				
	Hornbeak town	†	2 988	2 856	2 539	1 308	1 186	942	211.0	81.5	205.1	79.2	14.6	27.7	6.4	16.5				
	Samburg town		445	452	418	185	182	66	216	1.2	216	.5	370.8	890.0	154.2	370.0				
	Kenton-Mason Hill division		374	465	463	181	216	216	2.1	.5	2.1	.5	—	—	—	—				
	Kenton town (pt.)	†	434	174	178	646	705	654	154.5	59.7	153.0	59.1	9.4	24.3	4.2	10.9				
	Trimble town (pt.)		604	782	694	276	328	269	1.6	.6	1.6	.6	377.5	1 006.7	172.5	460.0				
	Obion-Troy division		4 122	4 360	3 652	1 697	1 747	1 336	194.6	75.1	194.1	75.0	21.2	55.0	8.7	22.6				
	Obion town	†	1 241	1 282	1 010	536	564	396	2.6	1.0	2.6	1.0	47.3	1 241.0	206.2	536.0				
	Troy town	†	1 047	1 093	826	454	456	319	2.8	1.1	2.8	1.1	373.9	951.8	162.1	412.7				
	South Fulton division		4 661	4 845	4 061	1 967	1 911	1 473	137.2	53.0	137.1	52.9	34.0	88.1	14.3	37.2				
	South Fulton city	†	2 688	2 735	3 122	1 182	1 147	1 142	7.9	3.0	7.9	3.0	340.3	896.0	149.6	394.0				
	Union City division		15 433	15 747	—	6 541	6 273	—	387.2	149.5	384.5	148.5	40.1	103.9	17.0	44.0				
	Rives town		344	386	385	141	146	133	9	.4	9	.4	382.2	860.0	156.7	352.5				
	Union City city	†	10 513	10 436	11 925	4 609	4 276	4 541	22.7	8.8	22.7	8.8	463.1	1 194.7	203.0	523.8				
	Woodland Mills city	†	398	526	396	161	197	133	2.7	1.1	2.7	1.1	147.4	361.8	59.6	146.4				
Overton County	Allons division	†	17 636	17 575	14 866	7 388	6 526	5 109	1 262	434.8	1 122.4	433.4	15.7	40.7	6.6	17.0				
	Alpine division		1 454	1 627	1 396	649	596	480	122.0	47.1	120.1	46.4	12.1	31.3	5.4	14.0				
	Crawford division		1 519	1 663	1 533	647	622	529	203.3	78.5	202.4	78.1	7.5	19.4	3.2	8.3				
	Hilborn division		2 088	2 090	1 835	823	707	589	276.8	106.9	276.3	106.7	7.6	19.6	3.0	7.7				
	Livingston division		772	1 781	1 421	719	666	473	149.9	57.9	149.7	57.8	11.8	30.7	4.8	12.4				
	Livingston town	†	7 276	7 083	6 243	3 110	2 753	2 187	182.4	70.4	182.1	70.3	40.0	103.5	17.1	44.2				
	Rickman division		3 809	3 372	3 050	1 679	1 390	1 120	13.4	5.2	13.2	5.1	288.6	746.9	127.2	329.2				
			3 527	3 331	2 438	1 440	1 182	851	191.8	74.0	191.7	74.0	18.4	47.7	7.5	19.1				
Perry County	Burdystown division	†	6 612	6 111	5 238	3 225	2 842	2 160	1 095.4	422.9	1 074.7	414.9	6.2	15.9	3.0	7.8				
	Burdystown town		4 255	3 919	3 533	2 025	1 752	1 396	677.3	261.5	666.7	257.4	6.4	16.5	3.0	7.9				
	Lobelville division		1 099	1 087	1 062	504	469	388	2.5	1.0	2.5	1.0	439.6	1 099.0	201.6	504.1				
	Lobelville city	†	2 357	2 192	1 705	1 200	1 090	764	418.1	161.4	407.9	157.5	5.8	15.0	2.9	7.1				
			830	993	773	387	384	306	10.2	3.9	10.2	3.9	81.4	212.8	37.9	99.1				
Pickett County	Byrdstown division		4 548	4 358	3 774	2 253	1 867	1 382	452.1	174.6	421.9	162.9	10.8	27.9	5.3	13.7				
	Byrdstown town		2 898	2 732	2 272	1 487	1 194	849	179.8	69.4	161.9	62.5	17.9	46.4	9.2	23.9				
	Midway division		998	884	582	429	335	236	3.9	1.5	3.9	1.5	255.9	665.3	110.0	286.1				
			648	594	52	320	285	203	85.8	33.1	74.3	29.7	6.7	22.2	4.3	10.1				